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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. *2013-785*

11 **DORA L. PINTO**
12 **2250 Holly Hall Drive #132**
13 **Houston, TX 77054**

A C C U S A T I O N

14 **Registered Nurse License No. 567453**

15 Respondent.

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17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
20 official capacity as the Executive Officer of the Board of Registered Nursing (Board),
21 Department of Consumer Affairs.

22 2. On or about June 14, 2000, the Board issued Registered Nurse License Number
23 567453 to Dora L. Pinto (Respondent). The Registered Nurse License was in full force and effect
24 at all times relevant to the charges brought herein and will expire on October 31, 2013, unless
25 renewed.

26 **JURISDICTION**

27 3. This Accusation is brought before the Board under the authority of the following
28 laws. All section references are to the Business and Professions Code unless otherwise indicated.

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1 CAUSE FOR DISCIPLINE

2 (Discipline by Another State)

3 8. Respondent is subject to disciplinary action under Code section 2761, subdivision
4 (a)(4) in that Respondent was disciplined by the Texas Board of Nursing. The circumstances are
5 as follows:

6 9. On or about June 24, 1997, the Texas Board of Nursing issued License No. 641420 to
7 Respondent to practice professional nursing.

8 10. On or about July 31, 2012, Respondent entered into an Agreed Order with the Texas
9 Board of Nursing whereby her professional nursing license was sanctioned subject to terms and
10 conditions. The Agreed Order became effective on September 11, 2012.

11 PRAYER

12 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
13 and that following the hearing, the Board of Registered Nursing issue a decision:

14 1. Revoking or suspending Registered Nurse License Number 567453, issued to Dora L.
15 Pinto;

16 2. Ordering Dora L. Pinto to pay the Board of Registered Nursing the reasonable costs
17 of the investigation and enforcement of this case, pursuant to Business and Professions Code
18 section 125.3;

19 3. Taking such other and further action as deemed necessary and proper.
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22 DATED: MARCH 18, 2013



23 *for* LOUISE R. BAILEY, M.ED., RN
24 Executive Officer
25 Board of Registered Nursing
26 Department of Consumer Affairs
27 State of California
28 Complainant

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